

From: [Wood, Nicole](#)
To: [Saric, James](#)
Cc: [Carlson, Janet](#)
Subject: RE: Area 1 FS ARARs
Date: Thursday, September 26, 2013 11:55:01 AM

Hi, Jim.

Can we schedule a call with the State go over their ARAR table?

I am available tomorrow between 9 and 3 and on Monday between 9 and 5.

They seem to have just cut and paste from the OU1 ARAR table that they presented to EPA, for example:

By statute, the Allied OU is a "facility." Response activities conducted at the site must meet the appropriate state-established protective criteria. If these criteria are attained the remedial action will be considered protective by MDEQ.

NREPA Part 201 rules MAC R 299.5101 - 5117; R 299.5701-5752

Also a lot of the requirements that they suggest are not more stringent than ours—for example they list NREPA soil clean up criteria, here the only thing we are cleaning up is PCB contamination and our cleanup levels are lower than the soil clean up criteria in 201, so we would not include soil clean up criteria in 201 as an ARAR. I think we need to talk to the state about this.

Polly is similar to a DOJ attorney, so I am not sure we need to include her, but let's leave it up to Paul to decide.

Thanks.

Nicole

From: Wood, Nicole
Sent: Thursday, September 26, 2013 11:08 AM
To: Saric, James
Subject: RE: Area 1 FS ARARs

Hi, Jim.

Did you see how small the table prints out?

Please ask them to send us the table in non-PDF document—maybe Excel.

Thanks

Nicole

From: Saric, James
Sent: Wednesday, August 21, 2013 2:58 PM
To: Wood, Nicole; Carlson, Janet
Subject: FW: Area 1 FS ARARs

Nicole and Jan,

Just received this. You'll have to compare this with the current ARARs in the revised FS.

thanks

Jim

From: Bucholtz, Paul (DEQ) <BUCHOLTZP@michigan.gov>

Sent: Wednesday, August 21, 2013 2:44 PM

To: Saric, James; Fortenberry, Chase; Draper, Cynthia E (Cynthia.Draper@amec.com)

Cc: Synk, Polly (AG); Devantier, Daria W. (DEQ)

Subject: Area 1 FS ARARs

Jim and Chase,

Attached is the ARAR list for the Area 1 FS. Let me know if you want to discuss these in more detail.
A hard copy will follow in the mail.

Paul

Paul Bucholtz
MDEQ-RRD Superfund Section
517-284-5072